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MONTANA EPA AGREEMENT

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MONTANA/ENVIRONMENTAL PROTECTION AGENCY

AGREEMENT

Agreement on the Management and Administration of Montana's Environmental Programs for Federal Fiscal Year 1986

June 1986

Approved:

The undersigned hereby execute this Cooperative Agreement on the Management and Administration of Montana's Fiscal Year 1986 Water Pollution Control, Safe Drinking Water, Underground Injection Control, Air Quality, Solid and Hazardous Waste Management, Superfund, Pesticides and Toxics programs.

State of Montana

Ted Schwinden
Governor, State of Montana

Date

John J. Drynan, M.D., Director
Department of Health and
Environmental Sciences

Date

Keith C. Kelly, Director
Department of Agriculture

Date

Environmental Protection Agency

John G. Wells
Regional Administrator

Date

John F. Wardell, Director
Montana Office

Date

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EXECUTIVE SUMMARY

INTRODUCTION

The goal of Montana's environmental health programs is to protect public health while sustaining a spirit of cooperation between environmental protection and resource development. Accomplishing this requires close coordination between the Departments of Health and Environmental Sciences (DHES) and Agriculture (DOA) for the state, and the federal government's Environmental Protection Agency (EPA).

Through grants, research, monitoring, technical expertise and other areas of cooperation, the DHES, DOA and EPA are helping Montanans maintain their quality of life. The Montana/EPA Agreement (MEA) contributes to this process by consolidating all applications and narratives into one document, thus producing a concise document, and reducing paperwork and duplication of effort.

The MEA programs are comprised of DOA's pesticide program, DHES's air, water and solid waste management programs, and EPA's toxics and underground injection control programs.

The elements of the MEA include: (1) An overview of the state's environment, (2) identification of priority objectives, (3) strategies to accomplish priorities and (4) detailed work plans, activities and commitments.

To better understand the programs, and what they plan to accomplish, each major area of environmental concern will have a narrative discussion of its programs, followed by media work plans defining the proposed work.

HIGHEST PRIORITY OBJECTIVES

The state and EPA Montana Office reviewed the environmental programs and established the following highest priority objectives. Although these priority objectives have been singled out as primary goals for the coming fiscal year, the individual programs have a wide range of important goals and accomplishments that also must be addressed during FY 1986.

--Implement Industrial Waste Pretreatment Programs at the following sites:

Butte
Bozeman
Helena
Billings
Missoula

--Complete Construction of the Anaconda Sewage Treatment Plant

--Complete the initial phase of the lower Clark Fork River Study and the Champion International environmental impact statement (EIS)

--Complete State Air Implementation Plans (SIP)

Butte Total Suspended Particulate (TSP)
Billings sulfur dioxide (SO_2)
Great Falls carbon monoxide (CO)

--Issue Resource Conservation and Recovery Act (RCRA) Permits for

Exxon
Conoco

--Implement RCRA Facility Management Plans (FMPs) for:

Exxon
Conoco (2)
Burlington Northern (BN) Somers
BN Paradise
Cenex
Transbas
Montana Refining

--Complete scheduled Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Superfund Comprehensive Accomplishment Plan (SCAP) Requirements for National Priority List (NPL) Sites:

Anaconda Remedial Investigation/Feasibility Study
Silver Bow Creek Remedial Investigation/Feasibility Study
Milltown Feasibility Study/Remedial Design
East Helena
Libby Groundwater
Burlington Northern, Somers
Others which receive FY 1986 funding

--Complete "Asbestos in Schools" Activities

--Continue progress toward nutrient removal in Flathead Basin Municipal Discharges

--Insure coordination between state and federal multi-media program tasks and projects.

--Continue successful progress in the public water supply program:

Toward obtaining filtration for all surface water utilized by public water supply systems
Toward increased compliance of monitoring requirements and maximum contaminant levels.

--Educational training for pesticide applicators.

PROGRAM DESCRIPTIONS AND WORK PLANS

Water

Planning, Monitoring and Management

The state of Montana refined its list of priority water bodies in FY 1985. One method, as reported in the 1984 305 (b) report, involved a rigorous computerized evaluation of all post-1975 water quality data in STORET. Seventy stream segments totaling 1,165 miles of man-caused water quality problems were identified in this manner. The Association of State And Interstate Water Pollution Control Administrators (ASIWPCA) non-point source (NPS) assessment, completed in April 1985, relied largely on professional judgement to identify nearly 7,000 stream miles in Montana where current uses were impaired by non-point sources of pollution.

Montana's most severe surface water quality problems are caused by 1) heavy metals from abandoned hardrock and coal mining operations, 2) sediment from poor agricultural and forest practices, 3) salinity, also from poor agricultural practices, and 4) nutrients, toxic ammonia and oxygen-demanding organic wastes from publicly-owned wastewater treatment plants. Through intensive surveys, an effort will be made in FY 1986 to verify and better characterize selected priority water quality problems.

Flathead Lake and the Clark Fork River will continue to be priority water bodies for monitoring in FY 1986. Flathead became a priority in 1983 when a lake-wide algae bloom indicated accelerated eutrophication (nutrient enrichment) was taking place. Monitoring will help measure the effectiveness of a phosphorus control strategy implemented by the state in 1984. The Clark Fork became a priority in April 1985, when the state issued a modified discharge permit to the Champion International paper mill near Missoula. The modified permit allowed the mill to increase its load of wastes to the river and to discharge year-round. Monitoring results will enable the state to prepare an environmental impact statement on to help decide whether to renew the modified permit in April 1986. Ongoing monitoring on the upper Clark Fork River, some of it in place for more than 10 years, will help evaluate the water quality effects of the Anaconda Company shutdown and reclamation efforts under CERCLA (Superfund) and the Abandoned Mine Program.

A major effort will be made in FY 1986 to review land-use proposals by the U.S. Forest Service (USFS) and the Bureau of Land Management (BLM) as reported in Forest and Resource Area Plans and Municipal Watershed Management Plans. The forest planning process will be in full swing during FY 1986. This effort will include an appraisal of monitoring plans to make sure they are adequate to measure significant water quality changes that may result from logging, road building and other activities on forested lands. In conjunction with this effort, the state will work with the USFS and others to adopt a uniform set of best management practices for forest activities.

In FY 1986 the state will continue to assist conservation districts in implementing NPS control programs and special water quality projects on priority bodies of water. And, for the first time, the state will provide input on priority agricultural water quality problems and needs to the ASCS to guide disbursement of ACP special project funds. The state's agricultural

water quality specialist will also promote communications among agricultural agencies on NPS water quality issues.

Central to the state's Water Quality Management Planning Program is maintenance of a list of priority water bodies and using the list to make management decisions that result in the greatest water quality and public health benefits. To these ends, the state will put a considerable amount of emphasis in FY 1986 on the preparation of the 1986 305(b) report, which will incorporate the results of the 1985 ASIWPCA NPS assessment and monitoring data collected since preparation of the 1984 report.

Wastewater Discharge Permit Program

Montana's wastewater surface discharge permit program began in 1968. With passage of PL 92-500 (Water Pollution Control Amendments of 1972), a federal wastewater discharge permit program was also initiated. In 1974 Montana applied for and received authority from EPA to administer this program, thus minimizing duplication of effort.

Tables #1 and #2 list the various categories of major and minor industrial wastewater discharges. Table #3 lists the number of facilities that presently have general wastewater discharge permits.

Table #4 lists the municipal discharges. Twenty-one of Montana's 26 major municipalities have treatment facilities capable of meeting secondary effluent limitations. Those that do not are Laurel, Libby, Lewistown, Wolf Point and Dillon. Major and minor wastewater treatment facilities are tracked for compliance. This document is updated periodically by the state permits and construction grants sections.

Many of the communities meeting secondary discharge limitations still have treatment facility needs. Kalispell, Whitefish, Columbia Falls and Bigfork are working toward meeting limitations for total phosphorus. The phosphorus limitations were imposed to help slow the eutrophication process in Flathead Lake. Phosphorus removal should begin at these facilities in FY 1986 or FY 1987. National Secondary Standards now include the provision for relaxed bio-oxygen demand (BOD) and total suspended solids (TSS) limits for certain lagoon and trickling filter facilities where water quality standards would not be affected by allowing the relaxed limits. This may allow some of the smaller communities to meet effluent limitations with a minimum amount of improvement. Some communities are still working toward meeting fecal coliform and/or chlorine limits.

Table 1. Major Industrial Wastewater Discharge Permittees

Category	Total No.
Sugar Refining	2
Coal Mines	3
Smelter	2
Plywood Mills	2
Oil Refineries	4
Paper Mills	1
Generating Plants	2
Ore Mining	2
Railroads	1
Totals	19

Table 2. Minor Industrial Wastewater Permittees

Category	Total Number
Oil Wells	17
Mines	128
Smelters	1
Railroads	4
Lumber & Plywood Mills	1
Oil Refineries	1
Sand & Gravel	5
Slaughter Plants	1
Cement Plants	2
Chemical Plants	1
Generating Plants	1
Industrial Sewage Treatment Plants	7
Miscellaneous	15
Totals	197

Table 3. General Permit Summary

General Permit Category	Effective Date of General Permit	Authorizations Issued Total	Currently Active
Suction Dredge*	6/3/83	52	49
Fish Farm	11/19/84	9	9
Construction Dewatering	7/14/83	28	4
Sewage Lagoon	6/14/83	18	18
Feed Lot	7/1/84	144 (large)	144 (large)
		43 (small)	43 (small)
Totals		294	267

*Considered by EPA to be issued under 404 rather than 402 authority.

Table 4. Municipal Wastewater Discharges with Individual Montana Pollution Discharge Elimination System (MPDES) Permits

	Major	Minor
Wastewater Treatment Facilities Municipal, State & Federal	26	71
Municipal Water Treatment Facilities/ Wastewater Disposal	--	11
Totals	26	82

Specific priorities for FY 1985 include:

- Issue, reissue or modify major permits ensuring that water quality standards are met; toxic criteria limitations and pretreatment requirements are imposed and residual wastes handled appropriately (input from Solid and Hazardous Waste Bureau (SHWB) to be provided), and appropriate effluent limitations and self-monitoring are provided.
- Issue, reissue or modify other permits with intent to eliminate backlog by September 30, 1985.
- Pursue general permit issuance for such categories as fish farms, water from oil wells and feed lots.
- Process 3 (a) authorizations and Water Quality Standard (401) certifications.
- Provide timely complaint response and follow-up.
- Provide compliance monitoring twice yearly of all major industrial permittee discharges and once yearly for 10 major municipal dischargers, completing form EPA-3560-3 for each.
- Compliance monitor at least 10 minor dischargers where self-monitoring data is suspect.
- Provide a quality assurance (QA) program to assure accurate self-monitoring data for the MPDES program.
- Pursue a vigorous compliance inspection program on mining activities during the summer months when activity is at its peak and gather information concerning impacts on water quality.
- Provide appropriate enforcement and report to EPA, giving priority to major dischargers and federally-funded minor municipalities.
- Provide timely review and appropriate notification on self-monitoring information.
- Review and revise the National Pollution Discharge Elimination System (NPDES) delegation agreement.

Groundwater Pollution Control Program

State groundwater regulations, called the Montana Groundwater Pollution Control System (MGWPCS), were promulgated by the Board of Health on October 29, 1982.

The MGWPCS program primarily addresses the protection of shallow groundwater aquifers from potential pollution sources, such as surface impoundments, waste piles, landfills, disposal systems and spills of various contaminants. Any of these potential pollution sources (except spills) which are not reviewed and approved, or required to obtain an operating permit under other regulations, are required to apply for and obtain a groundwater pollution control permit as outlined under MGWPCS. The WQB permits section reviews these applications and follows through the administrative procedures of issuing and managing the permits, including compliance monitoring, review of self monitoring, etc.

For similar sources that are reviewed and approved and/or permitted under other regulations, the MGWPCS rules do not require additional permitting; compliance is required with the state's groundwater quality

standards as outlined under MGWPCS. Compliance with the standards is then addressed within the other agency approval or permit. Examples of these joint reviews are Major Facility Siting Act (MFSA) projects under the Department of Natural Resources and Conservation (DNRC), mining and milling operations obtaining operating permits under the Department of State Lands (DSL), subdivision and other public or private waste treatment systems approved by the DHES and landfills and other solid waste disposal sites licensed by the DHES.

A problem that has become evident in the last two years, and turned out to be time-consuming, is groundwater contamination by petroleum fuels. This problem has been observed in nearly 50 locations throughout the state by spills at fueling stations or wrecks, leaking pipes or pipelines and leaking storage tanks. A professional in the groundwater field could easily spend his or her entire time working on various aspects of the petroleum pollution problem in Montana. As resources allow, a storage tank inventory including registration, tracking and monitoring will have to be completed and maintained for the state. Recent state legislative action provides authority to the DHES for the development of an underground storage tank program.

Other portions of the program which require significant resources are: review and processing of permit applications under MGWPCS (about 30 have been done to date); joint review of applications for permits or approvals under other regulations (about 25 have been done to date), and numerous complaint investigations involving potential groundwater pollution.

Priorities for FY 1986 include review and issuance of permits under the MGWPCS program and expansion of the groundwater investigation program to further identify sources of pollutants that have contaminated domestic wells.

The hiring of a hydrogeologist will significantly add to our ability to respond to groundwater program needs.

Contact Persons:

Water Quality Bureau, DHES (444-2406)

Steve Pilcher, Chief
Loren Bahls, Water Quality Management Section
Dan Fraser, Safe Drinking Water Section
Joe Steiner, Construction Grants Section
Fred Shewman, Permits and Enforcement Section
Abe Horpestad, Special Studies and Support Section

EPA Montana Office (449-5486)

Dick Montgomery, Water Quality Coordinator

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. WATER POLLUTION CONTROL					
A. Administration			2.08	.12	
1. Provide general program direction and supervision and development of staffing and budget needs.					WQB
2. Administrative support.					WQB
3. General policy guidance and periodic review of program outputs.					WQB, EPA
B. Wastewater Discharge Permit Program			5.22	1.06	
1. Issue, reissue, or modify within 6 months of application or expiration date major permits ensuring that water quality standards are met, toxic criteria limitations and pretreatment requirements are imposed, residual wastes are handled adequately and appropriate effluent limitations and self-monitoring are provided. EPA Montana issues permits on Indian Reservations.	4	7			WQB, EPA
2. Issue, reissue, or modify within 6 months of application or expiration date minor permits or general permits as needed to eliminate backlog of expired permits.					WQB, EPA
3. Conduct compliance inspection program with quarterly reports to EPA of completed inspections.					
a. All major municipal facilities will be inspected (compliance monitored or O&M inspected) at least annually with composite sampling at mechanical plants whenever possible.	10	26			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
b. All major industrial facilities will be compliance monitored (sampled or evaluated) at least annually.	6	19			WQB
c. Minor municipal and industrial facilities will be inspected when problems are suspected and as time permits. EPA conducts inspections on Indian Reservations.					WQB, EPA
4. Provide appropriate enforcement actions in accordance with State/EPA Enforcement Agreement.					WQB, EPA-MT & Denver
a. Update State/EPA Enforcement Agreement.	9/30/85				
5. Provide review and appropriate notification on self-monitoring information as reports are received. Copies of DMRs for majors and funded minors to MO for data entry in PCS. EPA-Helena reviews self-monitoring reports for Indian Reservation facilities for which responsibility has not been delegated. Conduct joint monthly DMR review meetings.	6	12			WQB, EPA
6. Develop process for issuing joint Notice of Violations (NOVs) to meet requirements of Section 309(a).	12/31/85				
7. Quarterly Noncompliance Reports for majors using National definition of significant noncompliance. Includes enforcement action summary report.	2	4			WQB
8. Semiannual Compliance Reports for completed federally-funded minor municipalities.	1	2			WQB, EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
9. Reconnaissance inspections. Estimated number = 75.	30	75			WQB, EPA
10. Jointly monitor approved local pretreatment programs. Pursue delegation of pretreatment program during FY86. EPA continues to provide technical assistance.					WQB, EPA MT & Denver
11. Investigate complaints of illegal discharges and possible violations of water quality standards and provide follow-up.	Quarterly Review	Quarterly Review			WQB, EPA
12. Implement the municipal compliance strategy. All facilities to be upgraded have approved compliance schedule by 9/30/85. All facilities in compliance by 7/1/88. Update municipal compliance strategy on semiannual basis.	9/30/85	2 meetings			WQB, EPA
13. Provide copies of all file documentation for major permits to Montana Office.	As Required	As Required			WQB, EPA
14. Follow up on the most significant problems identified through the DMR QA program and provide annual report to EPA. The results of this program will be utilized as a tool in selecting inspection candidates.		3/31/86			WQB
15. State program overview, policies, procedures and output reviews. Complete revision of the NPDES delegation agreement during FY86.		6/30/86			EPA, WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
C. Groundwater Pollution Control Program (excludes UIC)			1.45		
1. Issue, reissue or modify MGWPCS permits.	7	14			WQB
2. Joint review of DSL operating permits, exploration licenses, MFSA projects, Superfund projects, wastewater system plans, subdivision projects, SHWB landfills.	10	20			WQB
3. Provide sampling or evaluation inspections on permittees, joint inspections for groundwater compliance on other agency projects.	20	40			WQB
4. Investigate complaints of groundwater pollution, including petroleum fuels. Provide recommendation for enforcement and cleanup follow-up.	Quarterly Review	Quarterly Review			WQB
D. 404 Permit Review and 401 Certification			.30	.40	
1. Review proposed 404 permits. As necessary, establish conditions for 401 certification to prevent WQS violations or deny certification for projects that will violate WQ standards. Conduct inspections as necessary. EPA will provide 401 certification for proposed 404 permits on Indian Reservations.	Evaluate Program Quarterly	Evaluate Program Quarterly			WQB, EPA
2. Assist with the coordination of 310 and 404 permit programs.	Quarterly Review	Quarterly Review			WQB
3. Issue 3(a) authorizations for short-term activities which exceed turbidity standards. Conduct inspections as necessary to verify compliance.	Quarterly Review	Quarterly Review			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
4. Review and comment on proposed 404 permits to assure that projects are compatible with 404(b)(1) guidelines, or that appropriate conditions to insure compliance with 404(b)(1) guidelines are included. Conduct inspections as necessary.	Quarterly Review	Quarterly Review			EPA
5. Conduct follow-up inspections of projects carried out under 404 authority to verify compliance with permit or certification conditions.	1	2			EPA, WQB
E. Water Quality Standards			.25	.25	
1. The State and EPA will review existing information, studies, data, etc., for Prickly Pear Creek, Silver Bow Creek, Muddy Creek and Hot Springs Creek and identify additional information which is needed and studies which must be conducted to satisfy the Use Attainability requirements of 40 CFR Part 131.		1/1/86			EPA, WQB
2. Additional use attainability studies, if necessary, will be initiated; or existing information will be reformated to satisfy the Use Attainability requirements. The State shall submit Use Attainability Analyses justifying why these four stream segments cannot attain the fishable/swimmable goals either on a year-round or a seasonable basis.		Initiate Studies by 6/30/86 Submit Use Attainability Analyses by 6/30/87			EPA, WQB
3. Prepare report on Clark Fork River embryo-trout bioassays at Deer Lodge and Champion International (Frenchtown), and eighteen ceriodaphnia test sites.	9/1/85				EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
4. Identify water quality problems caused by toxic pollutants.	Quarterly Review	Quarterly Review			WQB
5. For toxic substances of concern, establish appropriate numeric criteria to protect designated uses; and/or where narrative criteria are used, develop guidance outlining implementation of those narrative criteria.	Quarterly Review	Final Report by 6/30/86			WQB
6. Review the current numeric limits for the Clark Fork River, classifications C-1 and C-2, provide scientific justification for current values or adopt appropriate revised criteria.	Quarterly Review	Final Report by 6/30/86			WQB
7. Identify methods by which ARM 16.20.634 is implemented to ensure that mixing zones are free of materials that would be acutely toxic to aquatic life.	Quarterly Review	Final Report by 6/30/86			WQB
8. The State shall clarify the meaning of "...adopts and incorporates..." in appropriate sections (3) and (4) of the Water Quality Standards ARM 16.20.617 through ARM 16.20.624.	Quarterly Review	Final Report by 9/30/86			WQB
9. If appropriate, hold a public hearing for WQS review and submit WQS revisions to EPA for approval/ disapproval.		Meeting Held by 6/30/86			WQB, EPA
F. Wasteload Allocation/Total Maximum Daily Loads					
1. The State and EPA will develop an agreement which establishes State procedures and processes for performing WLA/TMDLs.	Draft 12/31/85	6/30/86			WQB, EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
2. The State will develop, and EPA will review, individual WLA's until the State WLA process has been approved by EPA.		6/30/86			WQB, EPA
G. Operation and Maintenance/Operator Training			.50	.10	
1. Conduct 7500-5 on-site inspections, or the equivalent, using State inspection forms. Publically owned wastewater treatment works will be inspected at least once every three years.	25	50	Also Utilize Resources in Drinking Water & Construction Grants		WQB
2. Publish Big Sky Clearwater.	12/85	6/86			WQB
3. Conduct annual operators school at Montana State University.	9/85				WQB
4. Coordinate and monitor 104(g)(1) grants program and consider development of proposal for FY85 funds.					WQB
a. Complete selection of facilities.	6/85				WQB/NMC
b. Complete CPE's.	9/85				WQB/NMC
c. Complete CCP's.		4/86			WQB/NMC
d. Prepare Final Report.		6/86			WQB/NMC
5. Develop statewide operator training strategy; this may include consideration of 109(b) facility.		6/86			WQB/NMC

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
6. Review progress, provide assistance as requested in the conduct of the 104(g)(1) grant activities.	Quarterly Review	Quarterly Review			EPA
7. Issue certification licenses to operators and give examinations to new operators.					WQB & Water & Wastewater Operator Certification Board
a. Licenses issued.		600			
b. Exams given.		150			
H. Monitoring/Surveys/Surveillance			2.5		
1. Clark Fork River					
a. Monthly sampling at ongoing seven upper river stations.	Quarterly Review	Incorporate Summary of Results into 305(b) Report 5/30/86			WQB
Silver Bow Creek above Warm Springs Ponds Silver Bow Creek below Warm Springs Ponds Mill-Willow Bypass near mouth Warm Springs Creek at mouth Clark Fork River at Warm Springs Clark Fork River at Deer Lodge Clark Fork River at Garrison					
b. Revise the WQB Clark Fork River monitoring program in cooperation with the Interagency Task Force, Clark Fork River Basin Project, and Office of the Governor.	10/85				WQB
c. Lower Clark Fork River monitoring program (30 stations).	Quarterly Review	Quarterly Review			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
d. Incorporate preliminary results in 1986 305(b) report.		4/86			
2. Periodic sampling to check the effectiveness of and make necessary adjustments to the Freezeout Lake/ Priest Butte Lakes/Teton River WQ Management Plan.	Quarterly Review	Quarterly Review			WQB
3. Prepare 1985 irrigation season monitoring summary.	12/85				
4. Begin the "after" phases of the Hamilton/Bitterroot River and Hot Springs/Hot Springs Creek recovery studies.		3/86			WQB
5. Conduct diurnal dissolved oxygen monitoring on Ashley Creek above and below the Kalispell WWTP outfall. Incorporate results into reevaluation of Kalispell effluent limitations.		6/86			WQB
6. Support USGS suspended sediment/turbidity monitoring (ends September 30, 1985) and assist with DFWP invertebrate studies on the upper Yellowstone River.	8/85	6/86			WQB
7. Field validate priority WQ problems identified in the 1984 305(b) report and the ASIWPCA NPS report.	12/85	6/86			WQB
8. Perform temperature and other WQ monitoring on the upper Missouri River (above Canyon Ferry Dam) and tributaries to support a possible application for an instream flow reservation.	12/85				WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
9. Conduct additional monitoring/surveillance in support of permits, construction grants, WQ standards, and WLA studies as needed.	Quarterly Review	Quarterly Review			WQB
10. Review ASARCO/Troy ambient WQ monitoring data and ASARCO/Rock Creek baseline WQ data; perform annual reconnaissance at ASARCO/Troy.	10/85				WQB
11. Monitor for potentially toxic algae on Canyon Ferry Reservoir.	8/85				WQB
I. Quality Assurance					
Update quality assurance plan and field and laboratory procedures for water monitoring as needed to maintain approved QA program.	Semi-Annual Review	End of Year Review	.10		WQB CLB
J. Data Management	Semi-Annual Review	End of Year Review	.75	.20	
1. Keep files up to date.					WQB
2. Continue editing of data files.					WQB
3. Send MDHES WQ data system tape to EPA for STORET entry.	12/85				WQB
4. Process water quality data submitted by State into STORET.		1/86			EPA
5. Develop data management system for WQB biological data using the Bureau's new IBM PC system and a terminal in the WQB Biological Laboratory.					WQB

WATER QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
6. Edit ASIWPCA NPS report data and enter in computer.	12/85				WQB, EPA
7. Maintain paper (basin) files of ambient WQ data.					WQB
8. Complete computerized data analysis for the 1986 305(b) report.		1/86			EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
III. WATER QUALITY MANAGEMENT	Date of Completion				
A. Administration			.25	.25	
1. Provide general program direction, administrative and supervisory support to the WQ Management Section.	Quarterly Review	Quarterly Review			WQB
2. Meet to discuss program accomplishments and to identify and report progress.	Quarterly	Quarterly			WQB, EPA
3. Prepare a program oversight report on water quality management activities.	1/86	7/86			EPA
B. Water Quality Assessment/Planning/Reporting			1.65	.20	
1. Maintain a list of priority water bodies and use the list to reach decisions which result in the greatest water quality and public health benefits. Revise list in conjunction with 1986 305(b) report.		Revision Completed 3/86			WQB
2. Review construction grants and MPDES permit decisions for consistency with WQ management plans.	Quarterly Review	Quarterly Review			WQB
3. Review Blue Ribbons APO and Flathead Drainage 208 Project for possible dedesignation.	12/85				WQB, EPA
4. Attend Regional 305(b) workshop for State coordinators.	7/85				WQB
5. Finalize 305(b) regional handbook.	8/85				EPA
6. Prepare outline and work assignments and schedule for 1986 305(b) report.	9/85				WQB
7. Prepare and submit draft 1986 305(b) report, incorporating NPS survey revisions.		3/86			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
8. Review and comment on draft 1986 305(b) report.	Date of Completion	4/86			EPA
9. Submit final 1986 305(b) report to EPA.		5/86			WQB
10. Continue efforts to get U.S. Forest Service WQ data on STORET.		End of Year Review			WQB, EPA
11. Investigate the need for instream flow reservations for WQ protection on the upper Missouri River (above Canyon Ferry Dam) and tributaries.	Quarterly Review	Quarterly Review			WQB
12. Monitor water development and streamflow in the Yellowstone River Basin to protect the DHES instream flow reservation and WQ.	Quarterly Review	Quarterly Review			WQB
13. Prepare data report on Lower Clark Fork River monitoring through August 1985 and prepare EIS on renewal of Champion discharge permit.		4/86			WQB
14. Serve Montana on the Biological Resources Committee for the IJC Reference on the proposed coal mine on Cabin Creek, B.C.	Semi-Annual Review	End of Year Review			WQB
15. State will continue cooperative Flathead Lake phosphorous and primary productivity monitoring with U of M Yellow Bay Biological Station.	Semi-Annual Review	End of Year Review			
C. Nonpoint Source Pollution Control			1.75	.30	
1. Support the implementation and utilization of NPS policy and strategies developed by the National NPS Task Force through updated cooperative agreements and/or assessments of compliance with agency nonpoint source strategies and national nonpoint source policy.					WQB, EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
a. Federal Highway Administration	7/85				WQB, EPA
b. U.S. Forest Service	12/85				WQB, EPA
c. Bureau of Land Management	12/85				WQB, EPA
d. Soil Conservation Service	8/85				WQB, EPA
e. Agricultural Stabilization & Conservation Service	8/85				WQB, EPA
f. Cooperative Extension Service	9/85				WQB, EPA
2. Provide assistance to Conservation Districts in implementing NPS control programs and special water quality projects (e.g., Otter Creek and Mussellshell River Streambank inventories).	Quarterly Review	Quarterly Review			WQB
3. Provide input on priority agricultural water quality problems/needs to the ASCS ACP specialist to support distribution of 1986 ACP special project funds.	Quarterly Review	Quarterly Review			WQB, EPA
4. Monitor U.S. Forest Service and BLM activities (Forest and Resource Area Plans, Municipal Watershed Management Plans, etc.) in accordance with updated cooperative agreements.	Quarterly Review	Quarterly Review			WQB, EPA
5. Work with the U.S. Forest Service, State Division of Forestry and State Conservation Districts to pursue adoption of standardized BMP's for forest activities and improved monitoring programs.	Quarterly Review	Quarterly Review			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
6. Support efforts by the State Division of Forestry and the forest products industry to develop a strategy for mitigating cumulative impacts from forest activities in multiple-ownership watersheds.	Quarterly Review	Quarterly Review			WQB
7. Review and develop mining BMP's for mine reclamation, permitting, and discharge certification.	Quarterly Review	Quarterly Review			WQB
8. Work with the Department of State Lands, the U.S. Forest Service and BLM to develop an abandoned hard-rock mine reclamation program on federal and adjacent lands.	Quarterly Review	Quarterly Review			WQB

Drinking Water

The initial Montana law relating to public water supplies was enacted in 1907. This law was revised in 1977, and again in 1979, to enable Montana to receive and retain delegation for administration of the "Federal Safe Drinking Water Act" (PL 93-523) enacted in 1974. Montana's program covered about 250 community water systems prior to 1978. The present program regulates all systems which have at least 10 service connections or serve 25 individuals daily for at least 60 days a year. The public water supply (PWS) inventory varies, but usually includes about 625 community water systems and 1,420 non-community water systems.

From a quality standpoint, the state's drinking water is considered generally good in western Montana. Many supplies in eastern Montana, particularly groundwater, would be considered poor. The exceptions in western Montana are those waters high in turbidity. In the eastern part of the state, the communities using surface supplies, with few exceptions, have water treatment facilities capable of providing quality water. However, the groundwater supplies are generally high in total dissolved solids.

Montana has about 20 community PWSs which exceed the maximum contaminate level (MCL) for fluoride and about 10 systems that exceed the MCL for nitrate. All of these systems are required to notify the public and to provide bottled water for the affected population. The DHES has also initiated legal action against one supply which exceeds the nitrate MCL. The state's intent is to force them to provide an alternate source of acceptable water for their users.

Unfiltered surface water supplies are one of the state's major concerns. Several outbreaks of giardiasis have been experienced in the past few years. No unfiltered surface source is safe from giardia. During recent years, several communities have constructed new filtration plants or reconstructed existing facilities. These include Chinook, Chester, Conrad, Colstrip, Bozeman, Loma and Helena (for its Missouri River source) and Red Lodge. Culbertson's treatment facility will soon be completed. In addition to these PWSs, the program has been successful in obtaining filtration and disinfection for several noncommunity PWSs. One of the highest priorities is to see that proper treatment is provided for all surface water utilized by public water supply systems.

The vast majority of Montana's public water supplies are monitoring for bacteriological quality on a regular basis. The MCL for coliform bacteria is rarely exceeded. When it is, Water Quality Bureau (WQB) engineers work with PWS personnel to identify and solve the problem.

Radiological monitoring of the vast majority of Montana's PWS's has been done and one system was identified that exceeded a radiological MCL.

Priority objectives for FY 1986 include:

- Improve compliance of public water supplies for all of the requirements of the Safe Drinking Water Act.

- Monitor and enforce the public notification requirements of the Safe Drinking Water Act.
- Improve the bacteriological quality of those supplies not meeting the MCL for coliform bacteria.
- Grant exemptions and establish compliance schedules for those systems which need physical improvements to meet MCL's.
- Conduct field investigations for about 80 percent of all public water supplies.
- Provide technical assistance for the operation and maintenance of public water systems.
- Provide training and certification for operators.
- Review plans and specifications for new supplies and improvements to existing systems.
- Develop DHES policies to improve plan review and rewrite regulations as needed. Specifically, write a design manual for non-community PWSs.
- Provide certification of chemical and bacteriological laboratories.
- Conduct cooperative investigations of suspected giardiasis outbreaks by performing appropriate sampling and identification. Positive identification will be followed with assistance in corrective measures.

- Monitor and enforce the public notification requirements of the Safe Drinking Water Act.
- Improve the bacteriological quality of those supplies not meeting the MCL for coliform bacteria.
- Grant exemptions and establish compliance schedules for those systems which need physical improvements to meet MCL's.
- Conduct field investigations for about 80 percent of all public water supplies.
- Provide technical assistance for the operation and maintenance of public water systems.
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- Develop DHES policies to improve plan review and rewrite regulations as needed. Specifically, write a design manual for non-community PWSs.
- Provide certification of chemical and bacteriological laboratories.
- Conduct cooperative investigations of suspected giardiasis outbreaks by performing appropriate sampling and identification. Positive identification will be followed with assistance in corrective measures.

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
II. Drinking Water Program - Public Water Systems					
A. Administer program according to the Federal SDWA, State statutes and regulations, and grant regulations and conditions.			.75	.60	
1. Provide quarterly reports of violation data to EPA within 90 days of the end of each calendar quarter in the format requested by EPA.	2	4			WQB
2. Participate in program evaluation/oversight/data verification performed by EPA.		1			WQB
3. Administer local health department contracts for inspections of public water supplies.		21			WQB
4. Develop a Waterborne Disease Surveillance plan after receiving guidance from EPA.		6/30/86			WQB
B. PWS surveillance and technical assistance.			1.50	.05	
1. Conduct inspections of PWS's and make written reports. EPA will participate in approximately 5 percent of inspections conducted by WQB staff.	Semi-Annual Review	EOY Review			
a. WQB staff.		90			WQB
b. Contracted sanitarians.		600			WQB
c. Contracted individual(s).		300			WQB
2. Investigate suspected waterborne disease outbreaks.		By Incident			WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
3. Investigate suspected incidences of underground sources of drinking water contamination.		By Incident			WQB
C. Review plans and specifications for all new and/or modified PWS's.		120	1.05		WQB
D. Train and certify water system personnel. *One 1-week course 10 One-day seminars 2 Certification tests given Onsite Training for plant operators			.80		WQB
E. Enforce program regulations.	Semi-Annual Review	EOY Review	1.05		WQB
1. Monitor compliance of each PWS with program regulations.		2,014			
2. Assure that MCL violations are being corrected.					
3. Advise PWS's to give effective public notification of violations.					
4. Work towards achieving the following EPA compliance targets:					
a. Microbiological MCL - 93% compliance from all systems and no more than 0.5% persistent violations.					
b. Microbiological M/R - 75% compliance from all systems and no more than 7% persistent violators.					

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
c. Turbidity MCL - 97% compliance from all systems and no more than 0.5% persistent violators.	Date of Completion				
d. Turbidity M/R - 93% compliance from all systems and no more than 1% persistent violators.					
5. Take legal enforcement actions against recalcitrant and persistent violators.		As needed			
F. Maintain records essential for PWS program including inventory of all PWS's.	Semi-Annual Review	EOY Review	1.05		WQB
G. Provide laboratory capability to conduct analysis necessary for the program.	Semi-Annual Review	EOY Review			WQB
1. Recertify private microbiological laboratories to which PWS's submit samples for required analyses.		12			Lab
2. Bacteriological samples.		7,500			Lab
3. Chemical samples.		250			Lab
H. Underground Injection Control (UIC)					
1. Permit Issuance					
a. Review applications for and issue permits for new Class II wells and/or fields.		20			EPA
b. Review applications for and issue permits for existing Class II salt water disposal wells.		35			EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
2. Surveillance and Investigation					
a. Assure compliance with permit and other regulatory requirements through compliance inspections.		20			EPA, MO
b. Notify owner/operator and require mechanical integrity testing.		75			EPA, RO
c. Witness required mechanical integrity testing.		20			EPA, MO
d. Review operator supplied compliance reports.		2/86			EPA, RO
3. Administration					
a. Do annual report as required by 40 CFR 144.8(b).		2/86			EPA, RO
b. Update Class V inventory.					

Construction Grants

A federal grant program was initiated in 1956 to assist municipalities in the construction of sewage treatment facilities. The state has assisted the EPA and predecessor agencies in administration of this program by establishing needs and priorities, and reviewing project applications and preliminary and final plans.

Using the priority system developed by the WQB and approved by EPA, a priority list is drawn up at least once a year. Grant monies are then set aside for the top communities on the list.

During FY 1982 the Municipal Wastewater Treatment Construction Grants Amendments of 1981 (PL 97-117) were passed. The program went from a three step program (i.e. Step 1 - Facility Planning, Step 2 - Design and Step 3 - Construction) to a program where only one grant (Step 3 - Construction or Step 2 and 3 - Design and Construction) is offered, and within that grant, an allowance is given to cover a portion of the costs of facility planning and design. There is an exception where small, needy communities may receive an advance for the facility planning and design if the state decides these communities qualify. The program was made more flexible. It should allow for added state and local discretion. The federal share of the project costs was reduced from 75% to 55%, October 1, 1984.

Funding for the construction grants program has not been appropriated for FY 1986. PL 97-117 authorized funding of the grants program for four years at $2.4 billion per year. The funding was through federal fiscal year (FFY) 1985, however, there are indications that the same amount will be authorized and appropriated for FFY 1986. This would give Montana approximately $12 million. Such an appropriation would allow funding of four to ten projects. This number is dependent on the cost of the projects that rank the highest on the state priority list. The priority list for FFY 1986 will be determined and submitted to EPA for their approval by September 1, 1985.

The future of the construction grants program is in a state of uncertainty. The state shall actively pursue whatever changes become necessary to meet the changing federal program.

The state will assist EPA in meeting EPA's water accountability system to the extent resources and funding allow.

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
IV. Construction Grants					
A. Participate in Regional Construction Grants Oversight/ Office of Water Accountability Systems.			8.00	.55	WQB, EPA
1. Montana will submit detailed work plan containing core elements of the program including quantitative estimates of performance per Regional Construction Grants Oversight System and EPA's specific guidance by October 1, 1985. Upon acceptance by EPA it will become part of the SEA.					WQB
2. Montana will carry out the construction grants program in accordance with the 205(g) delegation agreement and the annual work plan. The Region will conduct all non-delegated functions consistent with these agreements.					WQB, EPA

Air

The Big Sky Country is truly what its name implies, yet there are places where the quality of air is a fragile resource. The plains east of the Rocky Mountains provide few obstructions to the sea of air that flows across the land, but in western, southern and central Montana, where various mountain ranges form valleys, air sometimes is trapped in layered inversions, causing degradation.

In addition to inversions and natural sources of contamination, man also plays a part in altering air quality. In urban areas throughout the state, such things as street dust, smoke from wood stoves and industrial emissions contribute to lowering air quality and visibility. In rural areas the largest contributors to air quality degradation are unpaved roads and mining operations.

Implementation plans have been developed and are being carried out for all areas (plan definition is still pending for Great Falls carbon monoxide). In Great Falls the carbon monoxide evaluation has been completed and control strategies identified. A SIP was submitted during late 1984, but has since been stalled when it was discovered carbon monoxide emission reductions at the Montana Refining Company (formerly Phillips Petroleum) were never achieved. This problem is currently being negotiated with Montana Refining Company with a resolution expected in the next few months.

A revised plan to control TSP in Butte as well as a request for redesignation to attainment was submitted in early calendar year 1983. Questions about the plan have been raised and answered. Plan approval and redesignation should quickly follow.

A study was recently completed in Billings to define the nature and extent of sulfur dioxide concentrations. Analysis of the data has established that there are no violations of federal ambient air quality standards. A redesignation will be requested in the near future.

The Missoula carbon monoxide attainment plan contains major modifications to the intersection of South Brooks and Russell. This project is currently underway and will be completed this fall. Despite these efforts, it appears standards may not be met without further reductions from residential wood burning. Missoula is now actively working on those strategies. Rules governing wood emissions have recently been put into place.

The Air Quality Bureau (AQB) processed more than 100 permits to assure that new air pollution sources comply with all air quality rules and standards. The DHES performed in excess of 17,000 laboratory analyses on 4,000 samples to evaluate the effects and levels of air pollution. It analyzed 120,000 hourly field samples to investigate the air pollution levels throughout the state.

The AQB enforced compliance with air quality rules through nearly 140 field surveillance actions, several notice-of-violations and several impositions of civil penalties.

Montana's ambient air monitoring network has been reviewed and modified as necessary.

Changes in permit and PSD rules were completed and continue to occur in order to obtain a fully approved implementation plan.

Nearly all nonattainment plans have been approved or conditionally approved. The SIP plan for Great Falls is expected to be resubmitted in October, 1985. The lead problem in East Helena has been studied and control strategies are currently under way. The Missoula plan modifications are currently underway and a target completion date of November, 1985. A resolution to the Billings CO plan has been noticed for approval in the Federal Register.

A part of SIP implementation is the state's compliance and enforcement program for stationary sources. Continued emphasis will be placed on major source (Class A) inspections since the Clean Air Act no longer allows for continued noncompliance of major sources through variance procedures. Significant violations by major sources in most instances will have to be dealt with through ~~court actions~~ and, if appropriate, by the imposition of civil or criminal penalties.

Montana operates an approved PSD program. Sources will be reviewed as appropriate under this program.

A continued program of inspections and enforcement is essential for maintaining ambient air quality standards throughout the state. The state, thus, will process new permits and schedule regular inspections in order to provide an assurance of compliance. Enforcement actions will be taken when appropriate.

The accurate measurement of Montana's present and future air quality plays an important role in existing and future SIP revisions. The location and impacts of new sources and proper technical impact analyses are essential for the continued protection of Montana's pristine air quality and to accommodate orderly industrial growth.

The state annually completes a review of its air monitoring program and submits a Network Review Report to EPA for approval. Modifications to the existing network will be carried out according to the schedules set forth in the report.

Montana will continue to actively pursue a high quality data retrieval program. It may be necessary to reduce monitoring efforts at some locations in order to realize this goal.

Montana will attempt to begin a program to audit continuous emission and ambient monitors operated by company personnel.

As a result of alleged violations of emission and ambient air quality standards in the Billings area, the DHES and six area industries signed a stipulation in late 1977 requiring, among other things, an intensive sulfur dioxide monitoring study. The study was initiated through contract in the fall of 1981. The study was completed in October, 1982. The study

involved four monitoring sites near Billings and two near Laurel in addition to upper air meteorological soundings. The Bureau has analyzed the data and determined that the area complies with the federal ambient air quality standards, but not state standards.

During the past few years, the DHES has become cognizant of an increased amount of flaring sour gas from oil wells. This practice has the potential of emitting significant amounts of sulfur dioxide into the atmosphere. The AQB will continue to contact these sources to determine the necessity of permits and control strategy for these sources. General rules designed to control the emissions are currently under development.

As a result of a recent court case (Environmental Defense Fund v. Ruckleshaus, No. C82-6850 RPA), Montana will develop rules and policy necessary to comply with Congress's intent to control visibility degredation in mandatory Class I areas. Rules have already been developed and submitted to the Board for new source review. Monitoring strategies are still under development.

It is becoming increasingly obvious that wood stove emissions are having a larger and larger impact upon air quality especially in western Montana. As a result of this, Montana is thus attempting to quantify their impact upon ambient air quality standards through the use of source apportionment studies. Should this source demonstrate a significant impact upon ambient air quality, as suspected, Montana will seriously consider imposing a performance standard for new, and possibly existing, wood stoves similar to Oregon and Colorado.

Contact Persons:

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AIR QUALITY MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
I. AIR ACTIVITIES					
A. Point Source Compliance					
1. State shall inspect each Class A-1 Source and approximately 1/2 of Class A-2 sources once per year. In addition to State inspections, EPA-Montana Office shall perform 12 facility overview inspections of Class A sources.	30	80			AQB, EPA
2. EPA shall inspect each Class A-1 Source and approximately 1/2 of all Class A-2 sources once per year for all sources located on federally-recognized tribal lands.	4	8			EPA
3. State shall provide EPA within 10 days copies of all violation inspection reports in accordance with the Enforcement Agreement.					AQB
B. Enforcement					
1. State shall take formal enforcement action against significant A-1 and A-2 sources within 60 days following violation in accordance with the Enforcement Agreement.	Quarterly Summary of Actions				AQB, EPA
2. Attempt to use continuous emission monitors (CEM) for enforcement purposes. Report excess emission reports (EER) to CDS.					AQB
3. Modify or reaffirm 1985 Enforcement Agreement as appropriate.	10/85				AQB, EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
C. Emission Inventory Update					
Update the emission inventory for Class A-1 and A-2 sources. Provide quarterly updates through the Emission Inventory System (EIS).	30	80			AQB
D. A-1 and A-2 Classification					
Identify A-1 and A-2 source classification.		Update EIS			AQB
E. Track Plans					
Track TSP, SO_2, lead and CO approved implementation plans in nonattainment areas. Request redesignation to attainment as appropriate.	Quarterly Status Summaries				AQB, EPA
F. Missoula CO and TSP SIP					
Continue to track CO and TSP progress. Provide for modification to SIP if warranted.	Report Status Quarterly				AQB, EPA
G. East Helena TSP and Lead SIP					
1. Continue to track Lead and TSP attainment plans.	Report Status Quarterly				AQB, EPA
2. Provide for modification to SIP if warranted.					AQB
3. Request redesignation for TSP if warranted.					AQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
H. Great Falls CO					
1. Modify plan to take into account new emissions from Montana Refining Company.		1/86			AQB
2. EPA take action.		6/86			EPA
I. New Source Review					
Process new source permits (PSD, nonattainment, or otherwise) as required. Copies of permits will be sent to EPA.		Approx. 80			AQB
J. Oil Well Flaring					
Continue to develop and implement rules for control of oil well flaring.	Report Status Quarterly				AQB, EPA
K. Monitoring					
1. Complete annual network review.	1 report	7/86			AQB, EPA
2. Complete annual review of quality assurance plan and standard operating procedures.		7/86			AQB, EPA
3. Quarterly reporting of NAMS/SLAMS data and agency and precision and accuracy data.	Quarterly Reporting				AQB
4. Perform system audits of State ambient air monitoring program.		9/86			EPA
5. Complete annual SLAMS reports.		6/86			AQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	
	Date of Completion				
L. Training		As Required			AQB, EPA
M. SIP Progress					
Prepare annual SIP progress report.		4/86			AQB
N. Performance Evaluation					
Conduct performance evaluation in accordance with National Air Audit System Guidance Manual.		5/86			EPA
O. SIP Revisions					
Develop SIP revisions as necessary within 9 months of promulgations of new or revised National Ambient Air Quality Standard.	Quarterly Status Report				AQB, EPA
P. Visibility					
Develop Phase II SIP for visibility as required.		9/86			AQB
Q. Acid Deposition					
Continue to participate in the STAR project.		As Required			AQB
R. Western Montana Particulates					
Conduct a chemical mass balance study in one or two western Montana cities to determine the cause of elevated ~~winter-time~~ particulate readings.		~~8/86~~ 1/87			AQB

Solid and Hazardous Waste Management

The disposal of solid waste has become a major, complex problem in Montana. Due to its nature, it also relates to air, water and land pollution. The solid waste problem will become more expensive and complicated. Our society consumes enormous quantities of material and energy which in turn generate an exceedingly large volume of waste. Approximately 600,000 tons of municipal solid wastes are being generated every year in Montana. Given the well-established waste generation rates, by 1990 nearly 870,000 tons of waste will be generated per year. This waste is being disposed in more than 230 identified municipal disposal facilities and numerous undisclosed dump sites.

State records also indicate that approximately 10,000 tons of potentially hazardous wastes are generated each year in Montana. This volume of hazardous waste includes pesticides, heavy metals and other industrial chemical wastes. A large number of "empty" pesticide and other toxic chemical containers of all sizes are also discarded annually.

The state now possesses sufficient regulatory authority to control solid waste disposal. As required by the 1977 "Montana Solid Waste Management Act," the Solid and Hazardous Waste Bureau (SHWB) currently is licensing all solid waste management systems in the state. This licensing procedure assures that all such systems will provide a basic public service and not degrade the environment. To date, a total of 221 waste management systems have been licensed by the bureau.

Montana, through the SHWB, has received "final" authorization to manage a state hazardous waste management program. However, because of major changes in the RCRA, the SHWB will be initiating major program development activities to insure that the state program remains equivalent to its federal counterpart. The following number of businesses are presently regulated under the hazardous waste program:

Generators	50
Treatment, Storage and Disposal Facilities	10
Transporters	40

The U.S. Congress has passed legislation to reduce the weight exemption limit for hazardous wastes from 1000 kilograms to 100 kilograms. Under the new regulations, the SHWB estimates that the number of regulated generators may increase ten-fold from the current status to approximately 900 to 1000 new generators.

Other than the few generators with on-site treatment, storage and disposal facilities, hazardous waste generators in Montana are dependent on out-of-state disposal facilities. Distances to out-of-state facilities are substantial for Montana operators, and this is viewed as burdensome especially from the standpoint of transportation costs. Also, disposal fees charged by the out-of-state facilities routinely increase. These costs are especially taxing to small generators. It is also a possibility that these facilities may terminate their business either permanently or for indefinite periods of time.

EPA has until March 31, 1986 to develop standards for the small quantity generators. Until the standards become effective, these generators may dispose of the wastes in state approved sanitary landfills that are operated by municipalities and districts throughout the state. However, there is a growing reluctance among landfill operators to accept even small quantities of hazardous waste because of the future liability they may incur.

A fee system has been established to assist in the management of a state hazardous waste program. Under the system, hazardous waste generators and treatment, storage and disposal facilities are required to pay a fee to the state to help defray the costs of managing the state hazardous waste program.

During FY 1986 a priority will be the continued implementation and maintenance of a fully authorized state hazardous waste regulatory program. Such status will encompass complete state authority over hazardous waste generators, transporters and treatment, storage and disposal facilities. This authority will provide state primacy in permitting, monitoring and enforcement activities. The program will include continuing the notification procedures by regulated communities of hazardous waste activities.

The DHES will continue to provide an emergency response system, which includes a response plan and emergency response team. This team is comprised of state agencies representing a broad spectrum of disciplines. Such a structure assures that state government can provide technical advice and direct assistance to a variety of emergency situations.

As the state's hazardous waste program matures, measures will be taken to assure that an adequate work force is available. Efforts will be made as needed to supplement the current hazardous waste staff. In addition, the ongoing training of current staff will be maintained.

Funds from the state Resource Indemnity Trust Fund have been allocated to the SHWB to develop a statewide hazardous waste collection/transfer station program. During the next two years, the bureau will conduct extensive feasibility analysis, pre-design and construction activities to establish such a program.

A concerted effort will be made to provide for public participation. Current state laws and regulations provide formal provisions for insuring public review and comment in the issuance of all permits. The level of public participation undertaken in other activities will depend on the degree of interest from affected or interested persons. Public participation will rely heavily on the mass media, direct mailings, public meetings and public hearings.

Under licensing procedures required by state law, the SHWB will continue to maintain an inspection program of all waste management facilities. The bureau will initiate enforcement action on facilities identified as open dumps and for which no effort has been taken to close or upgrade.

The SHWB will continue to maintain a planning grant program to provide technical and consultant assistance to local governments for developing recycling and resource recovery activities. To the extent possible, the SHWB will continue to assist in the proper disposal of small quantity hazardous wastes.

Remedial investigations and feasibility studies will continue on the seven uncontrolled hazardous waste sites identified in the National Priority List. The purpose of remedial investigations is to determine the nature and extent of the problem at the sites and gather all necessary data to support work conducted during the study period. The DHES has entered into cooperative agreements with EPA to administer investigations and corrective actions on two of the sites. Funds from the state's Resource Indemnity Trust Fund will be used as match for the CERCLA program.

The SHWB has applied for and received continued grant funds under the Abandoned Site Discovery Program (Section 3012 of RCRA) to conduct preliminary assessments and, where necessary, conduct site inspections of potentially uncontrolled wastes sites identified in EPA's ERRIS. Initial prioritization by state and EPA officials have identified 37 sites with a high or medium priority listing. By the end of FY 1986, all sites on the ERRIS list will have received preliminary assessments and/or site inspections. In the course of conducting project activities, efforts will be made to identify uncontrolled waste sites currently not listed in ERRIS.

The DHES has been appointed to be the administrative agency for coordination of the regulation of the underground storage tank program which was recently enacted by Congress. In FY 1986 this program will consist mainly of informing tank owners of the new requirements and the inventorying of tanks.

Contact Persons:

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
I. Develop state program to include provisions of Hazardous and Solid Waste Act Amendments of 1984							1.755	
A. Small quantity generator program.								
1. Transfer station								
a. Feasibility Study	Completed			1		Contract		SHWB
b. Pre-Design	Completed				1	Contract		SHWB
2. Notification		1000						SHWB, EPA
3. Regulation preparation					1			SHWB
B. Authorization of State Program Revisions (HSWA).								
1. Regulation development			1					SHWB
2. Application preparation	Ongoing							
C. Development of joint State/EPA permit process.		1						SHWB, EPA
D. Training.								
1. Staff training	9	2	3	2	2			SHWB
2. Public education efforts								
Small quantity			1					SHWB, EPA
New RCRA			1					SHWB, EPA

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
II. Implement Hazardous Waste Management Program Activities								
A. Facility Management Planning.							.06	
1. Final preparation of multiyear strategies		9						SHWB, EPA
2. Update strategies as appropriate	Ongoing							SHWB, EPA
B. Compliance inspections.							1.77	
1. Non-notifiers	15	5	4	2	4			SHWB, EPA
2. Small quantity	12	4	4	1	3			SHWB, EPA
3. Generators	17	4	4	2	7			SHWB, EPA
4. Transporters	5	2	2		1			SHWB, EPA
5. TSD's								
a. Record reviews								
i. Closure/post closure	10	2	2	4	2			SHWB, EPA
ii. Financial	10	2	2	4	2			SHWB, EPA
b. On-site								
i. Compliance evaluation (CEI)	10	2	6		2			SHWB, EPA
ii. Comprehensive groundwater monitoring (CME)	8	2	6					SHWB, EPA

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
6. Corrective measures (TSDs)	As required							SHWB, EPA
7. Follow-up	8	3	2	1	2			SHWB, EPA
8. Inspection report preparation	1 per inspection	Within 30 days of inspection						SHWB, EPA
C. Manifest exception and discrepancy reports.	As required							
D. Permitting.							2.60	
1. Permit application requests	All current active facilities have been requested.							
2. Permit application completeness/ technical reviews	4	1	1		2			SHWB, EPA
3. Draft permit conditions	4		1	2	1			SHWB, EPA
4. Permit issuance or denial	3			1	2			SHWB, EPA
5. Closure/post closure								
a. Plan review	1				1			SHWB, EPA
b. Final action	2	2						SHWB, EPA
6. Termination of Interim Status	As required							
7. Corrective actions								
a. Determinations	6		2	2	2			SHWB, EPA
b. PA/SI					2			SHWB, EPA

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
8. Exposure information evaluation	5		1	1	3			SHWB, EPA
9. Surface impoundment waiver	None anticipated							
10. Expanded public involvement	None anticipated							EPA
E. Enforcement.							1.24	
1. Amend Enforcement Agreement as appropriate	1		1					SHWB, EPA
2. Warning letters	See Enforcement Agreement for criteria for Items 2 through 6							SHWB, EPA
3. Administrative Orders/NOV	See Enforcement Agreement							
4. Civil actions								
5. Criminal actions								
6. Requests for EPA enforcement action	2		1	1				SHWB
7. Facilities returned to compliance	See Enforcement Agreement							SHWB, EPA
a. Groundwater								
b. Closure/post-closure								
c. Financial assurance								
F. Reports provided to EPA.							.20	
1. Compliance monitoring and enforcement logs	Monthly	3	3	3	3			SHWB
2. Facility status sheets	Monthly	3	3	3	3			SHWB

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
3. Permit status sheets	Monthly	3	3	3	3			SHWB
4. Statistical inspection/compliance summaries	Quarterly	1	1	1	1			SHWB
G. EPA Oversight.								
1. Inspection	6	2	4				See 2.10 Above Categories	EPA
2. Enforcement actions	2		1	1				EPA
3. Permitting								
a. Joint permits	2			1	1			SHWB, EPA
b. Permit reviews	2			1	1			
4. Closure/post closure	2		2					EPA, SHWB
5. State program audits	2		1		1			EPA
III. Regulation of Underground Storage Tanks.							1.00	
A. Regulation development			1					SHWB
B. Program development	Ongoing							SHWB
C. Notification	Ongoing							SHWB
D. Public information	Ongoing							SHWB
E. Cooperative agreement development		1						SHWB, EPA

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
IV. Implement Requirements of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA)								
A. Investigate sources of release and threats of possible release of hazardous substances.							1.00	SHWB, EPA
1. Perform investigations as provided under 3012 Cooperative Agreement			10/30	1/30	4/30	7/30		SHWB, EPA
a. Quarterly 3012 Report	4							
b. Preliminary Assessments	20							
c. Site Investigations	8							
2. Direct other FIT activities	As Needed							SHWB, EPA
3. Develop submission for National Priorities List (NPL)	2							
B. Review and make funding determinations for CERCLA actions to control releases when responsible party fails to provide proper response.	1							EPA, SWMB
C. Implement Cooperative Agreements and SCAP/ Site Management Plan commitments for remedial investigations/feasibility studies, remedial measures at specific sites.							1.00	SWMB, EPA
1. Milltown								
2. Silver Bow Creek								
3. New sites (as identified)								

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
D. Implement Multi-Site Cooperative Agreements for management assistance.							.90	
1. Number of sites dependent on FY86 SCAP allocations								
E. Monitor enforcement/remedial activities as specified in SCAP commitments and Site Management Plans at sites where responsible parties undertake clean-up activities.							.50	EPA, SHWB
1. East Helena								
2. Anaconda Smelter, Anaconda								
3. Libby								
4. BN Somers								
5. New sites (as identified)*								
F. Reporting requirements including ADP.	Monthly						.05	EPA, SHWB
G. Coordinate CERCLA activities with other statutes (e.g., RCRA/CWA, etc.)								

*Actual number of CERCLA actions initiated will be dependent on FY86 SCAP allocations.

ACTIVITY/OUTPUT	OUTPUT QUANTITY	BY QUARTER 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	RESPONSIBLE AGENCY
V. Maintain Solid Waste Management Program								
A. Inspection and enforcement.								
1. Continued maintenance of a waste management inspection program.								
2. Prepare and initiate enforcement actions where violations of license conditions have occurred.								
3. Follow-up inspections where enforcement action has taken place.								

Pesticides

Montana is primarily an agricultural state, and as such, requires the use of pesticides to help manage a multitude of pest problems. Based on data collected from commercial applicators, it is estimated that from 2.8-3 million acres are treated commercially each year. There are no accurate statistics available for private applicators, but generally the private applicators treat smaller acreages, do spot treating and field margin treating. In most years, private applicators would probably apply pesticides to 1.5-2 million acres.

The Environmental Management Division (EMD), of the Montana Department of Agriculture (DOA), has a responsibility to not only serve Montana agriculture, but is also mandated to protect the environment and the health of the state's citizens. Toward this end, the Environmental Management Division administers a pesticide applicator certification program and an enforcement program.

Recertification of commercial applicators and dealers has been implemented. Private applicators are on a five year cycle, with one of the five agricultural districts being recertified each year. Commercial applicators and dealers are on a four year recertification schedule. The applicator categories have been divided among the four year period, so that not all categories are due for recertification the same year.

EMD provides pest management services to producers, industry, government agencies and the general public. These services include establishing integrated pest management programs for specific cropping systems, recommendations on use of pesticides, identification and surveillance of pests and the evaluation and resolution of the effects of pesticides on agriculture and the environment. The division also registers pesticide products prior to their use in the state; licenses pesticide dealers, commercial and government applicators and their employees; licenses private applicators, and regulates the sale of pesticides. The department's laboratory provides analytical regulatory and service analysis to other departmental programs and to the general public.

Pesticide specialists conduct dealer, applicator and marketplace inspections. Compliance with record keeping requirements and other provisions of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and the Montana Pesticide Act (MPA) is monitored and documented.

The analytical laboratory follows its approved quality assurance program for all enforcement samples. Non-regulatory environmental samples follow quality assurance procedures if requested by the submittor. The laboratory participates in the EPA check sample and sample check analysis procedure programs. The laboratory recently improved analytical techniques for the analysis of several biological and environmental samples.

A limited pesticide groundwater sampling program was started in FY 1984. Three different agricultural production areas were selected and groundwater samples have been collected from 22 sites, consisting of domestic wells, two irrigation wells and one gravel pit. All sites were analyzed for organochlorines, several sites were analyzed for aldicarb

(Temik) and 15 sites were analyzed for picloram (Tordon) and phenoxy herbicides. Low levels of several phenoxy herbicides were detected at several sites. Sampling of the positive wells will continue in FY 1986. Selection and monitoring of additional sites will also be conducted.

Monitoring for residues and potential environmental contamination resulting from the use of Specific Exemption (Section 18, FIFRA), Special Local Need (Section; 24(c), FIFRA) and experimental use pesticides will continue in FY 1986.

Priorities

Pesticides

Enforcement

1) Drift from pesticide application.

2) Disposal of pesticides and pesticide containers.

3) Enforcement against illegal sale or use of recently suspended, cancelled or restricted pesticides.

4) Enforcement against pesticide misuse that could result in pesticide contamination of groundwater. Monitoring of groundwater for pesticide residues.

Certification

1) Continue evaluation of pesticide dealer and commercial, government and farm applicator training courses.

2) Update the Montana State Plan for the Certification of Applicators of Restricted Use Pesticides to conform with the state's amended pesticide legislation.

The DOA's authority for registering pesticides, licensing and certifying applicators, licensing dealers and operators and for conducting inspections and carrying out enforcement actions is provided for in the Montana Pesticides Act, Section 80-8-101 through 306 MCA 1979.

The DOA proposes to continue the comprehensive cooperative enforcement program and agreement with EPA through inspections (including use/misuse, restricted and general use products, records and proper licensing), investigations, pesticide sampling, laboratory pesticide analysis, efficacy studies and enforcement actions. These activities would be continued under the quality assurance agreements made with EPA under previous grants. The DOA's pesticide specialists hold EPA credentials and have the authority to carry out the mandates of the FIFRA as well as the Montana Pesticides Act.

The DOA has been granted "primacy" under Section 26 of FIFRA, as amended. It is the intent of the department to serve as the primary agency in conducting inspections, investigations and sample collection and analysis in accordance with EPA approved procedures and to take effective

action against violators. The outputs listed in the media work plan reflect those that are funded by the EPA grant and those that will be funded by the state. The DOA will continue to issue and monitor Section 24(c)'s, Section 18's and experimental use permits.

The DOA's Field Services Bureau and Pesticide Analytical Laboratory will continue to maintain the quality assurance program for sample handling and analysis. The laboratory will continue to provide pesticide analytical services to EPA and other states on a fee basis which will cover the cost of supplies, materials and communications.

The DOA will continue the compliance monitoring strategy for the Label Improvement Program (LIP) requirements as well as the Child Resistant Packaging (CRP) requirements which will be issued by EPA. This compliance monitoring strategy will be reflected under the Producer Establishment Inspection category.

The DOA will continue to investigate pesticide drift problems. This will include defining drift problems in Montana; developing procedures to prevent herbicide damage to, and illegal residues in, off-target vegetative crops, ornamentals and grasses; developing procedures to prevent off-target insecticide drift which may affect human health and cause illegal residues in the environment, and developing sampling techniques and procedures for the collection and analysis of environmental samples affected by drift.

The DOA will continue, in cooperation with the DHES, an educational compliance and enforcement program on disposal of pesticides and pesticide containers in accordance with FIFRA and the Montana Pesticide Act and the RCRA regulations. Most efforts will likely be directed at the small quantity generators.

The DOA will, through records and use inspections, determine if illegal sale or use of suspended, cancelled or restricted pesticides is occurring. Enforcement actions will be initiated for those not in compliance.

The DOA will continue the program of environmental sampling and monitoring. This will include continuing the monitoring program for pesticides in soil, crops, domestic animals and wildlife to provide baseline data on an as needed basis. Monitoring of ground water in selected areas will continue to determine the degree and amount of pesticide contamination.

Inspection of pest control operators (PCO) for misuse during structural applications will continue, but because of the relatively small number of PCO's in Montana this will be a minor priority.

The exposure of Montana farm workers to pesticides before, during or after application appears to be of minor concern. However, use inspections of fields in which workers may be exposed will continue to determine if label safety requirements are being met.

The DOA does not anticipate any major spray programs in Montana during FY 1986. However, should one occur, the Department will monitor it and institute any necessary enforcement actions.

The certification program is a federally mandated program which requires pesticide applicators using restricted-use pesticides to comply with state and federal certification standards. The Montana Certification Plan was approved by EPA and has been in effect since 1976. Recent legislative changes will require that the State Plan be revised and updated to conform with the intent of the Montana Pesticides Act.

Most of the commercial and government applicators requiring certification have been certified, but the strategy will be to conduct at least one general certification course (20 hours) for new applicators who wish to be certified. Approximately 90 percent of the private applicators desiring certification have been certified. The strategy will be to conduct training for private applicators in those counties where the need is expressed.

The strategy will be to maintain the data processing system for the storage of qualification data for dealers and applicators and for the issuance of certification credentials to qualified applicators as well as to newly certified individuals entering the system.

An evaluation of applicator training (both commercial and private) was started in FY 1985. This will be continued, with the final report and recommendations due at the end of FY 1986.

The strategy for recertification will be to provide recertification training for the following applicator categories: Seed Treatment; Industrial, Institutional, Structural and Health Related; Forest Pest Control; Ornamental and Turf Pest Control and Aquatic Pest Control. Additionally, the private applicators in Agricultural District III will receive recertification training specific to their needs (crops, cropping systems and pest complexes present in these counties). The 1985 Legislature passed a bill amending the Montana Pesticides Act which requires that private (farm) applicators attend six (6) hours of recertification training during the five year recertification period.

The specific activities and accomplishment commitments (federal and state) can be found in the Pesticides Media Work Plan.

Contact Persons:

Environmental Management Division, DOA (444-2944)

Gary Gingery - Administrator
Laszlo Torma - Laboratory Bureau Chief
Robert LaRue - Field Services Bureau Chief
George Algard - Technical Services Bureau Chief

EPA Montana Office (449-5486)
Dick Montgomery, Pesticides Coordinator

PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE				RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR		THROUGH END OF YEAR		WORKYEARS		
	Date of Completion				STATE	EPA	
Enforcement Program	G.	P.	G.	P.			
Conduct Agricultural Use Inspections	10	60	10	40			MDA
Conduct Agricultural Follow-Up Inspections	30	150	30	90	1.2		MDA
Conduct Non Agricultural Use Inspections	1	6	2	6			MDA
Conduct Non Agricultural Follow-Up Inspections	2	10	3	10			MDA
Conduct Experimental Use Permit Inspections	1	2	1	2	0.10		MDA
Conduct Producer Establishment Inspections	--	--	3	--	0.15		MDA
Conduct Market Place Inspections	40	160	40	160	0.2		MDA
Conduct Staff Training	as needed		as needed		0.5		MDA
Case Preparation/Compliance/Enforcement	as needed		as needed		0.2		MDA
Conduct Pesticide Dealer Inspections	25	100	25	100			MDA
Review Pesticide Dealer Records	150	400	150	800	0.7		MDA
Review Applicator Use Records	50	200	50	200	0.2		MDA
Compliance Training	as needed		as needed		0.2		MDA
Sample Collection, Formulation and Residue	80	128	68	140	1.0		MDA
Formulation Sample Analysis	15	10	18	47			MDA
Residue Sample Analysis	50	90	35	66	5.0		MDA
Investigations, Complaints, Damage Cases, Environmental, Waste and Water Samples.							
Quality Control Samples	15	28	15	27			MDA
EPA pesticide and other organic chemical samples numbers will vary depending on analytical complexity	35		55		1.6		MDA
Certification Program							
Issue certification credentials	--		4,000		1.4		MDA
Provide initial and certification/recertification training for applicators and dealers.	--		3,000		0.6		MDA

G. - Grant Supported P. - Primacy/State Supported

Asbestos

EPA regulations requiring public and private elementary and secondary schools in the United States to identify friable asbestos became effective June 28, 1982. Included in the regulations are requirements to identify friable asbestos in building materials, maintain records, notify employees of the location of materials containing asbestos, provide employees with instructions on reducing exposures and notifying parent-teacher associations of inspection results.

EPA's Montana Office will coordinate with the DHES and Montana Office of Public Instruction to assist local education agencies in complying by providing information and technical assistance. School administrators will be informed of the mandatory program and will be provided assistance as needed.

Polychlorinated Biphenyl (PCB)

Updated PCB regulations were promulgated by EPA on August 25, 1982 as the result of a lawsuit settlement. These regulations require the periodic inspection of PCB transformers and increased record keeping procedures.

National Environmental Policy Act (NEPA)

The highest priority activity under NEPA is review of USFS management plans and environmental impact statements. These plans identify long-range management alternatives and will therefore determine environmental protection for much of the remaining pristine areas in Montana.

Other activities reviewed under NEPA include:

- BLM project proposals,
- Bonneville Power Administration (BPA) transmission lines,
- USFS seismic projects and
- Municipal waste treatment grant projects.

Public Participation

The comments of interested persons, lawmakers, State, Federal and local health and/or environmentally-related agencies and appropriate citizen advisory groups was sought through the drafting and distribution of this agreement.

New phases of programs and developments were presented to interested persons and agencies via news media releases, newsletter articles, TV and radio media.

TOXICS SUBSTANCES MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. Toxic Substances*					
A. Protect health and well being of school children attending schools that contain friable asbestos-containing materials.				.25	
1. Provide assistance and technical advice to school district administrators in complying with the asbestos rule.					EPA
2. Inspect school districts for compliance with asbestos program requirements. Carry out necessary follow-up action.	10	20			EPA
B. Ensure mutual information exchange regarding significant toxics activities.				.05	EPA
1. Provide quarterly list of inspections performed.	2	4			EPA
2. Notify State of cases filed by EPA within 4 days of the action.					EPA
3. Consult with State on methods of dealing with PCB users both from a consulting and an enforcement viewpoint.					EPA
C. Report within thirty (30) days incidents involving chemical contamination.					DHES, DOA EPA
D. Implement PCB work plan.				.30	EPA
1. Inspect facilities which store or use PCB-containing materials.	10	20			

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
2. Prepare any technical documentation in support of enforcement actions for violations found during inspections within forty-five (45) days.					EPA
E. Implement Section 13 Imports Compliance inspection program.	To Be Further Defined by Region			.10	

*Final commitments will be adjusted upward or downward from those indicated above depending on the actual level of resources allocated to the Montana Office in FY86.

QUALITY ASSURANCE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. PESTICIDES	Semi-Annual Review	EOY Review	.30	.10	
A. Evaluate State's QA plans and activities associated with the Pesticide Enforcement Grant; provide audit samples.					EPA
B. Operate the State's Pesticide QA Program.					MDA
C. Participate in systems audit.					MDA
D. Submit QA plan for FIFRA monitoring program during the grant application process.		Grant Approval			MDA
II. HAZARDOUS WASTE	Semi-Annual Review	EOY Review	.30	.10	
A. Continue to develop and improve the State's Hazardous Waste Program.					SHWB
B. Evaluate State's QA plans and activities associated within the Hazardous Waste Program; provide audit samples (as available).					EPA
C. Submit QA Plan during grant application process.					SHWB
D. Implement the State's QA Program.					SHWB

QUALITY ASSURANCE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
III. WATER PROGRAMS	Date of Completion Semi-Annual Review	EOY Review			
A. Ambient Water Monitoring			.50	.10	
1. Evaluate State's water monitoring QA program.					EPA, QAO
2. Operate State's QA program.					WQB
3. Submit State's QA plans for water monitoring/NPDES for review during grant application.					WQB
4. Review/approve QA plan.		30 Days from Receipt			EPA
B. Safe Drinking Water Act	Semi-Annual Review	EOY Review	1.00	.10	
1. Evaluate and certify State Principal Laboratory(s).		6/30/86			EPA, QAO
2. Administer SDA Certification Program.					WQB
3. Evaluate and audit local certified laboratories.					WQB
4. Submit States SDWA QA plans for review during grant application.					WQB
5. Review SDWA QA plan.		30 Days from Receipt			EPA, QAO
C. Provide reference samples for water laboratories upon request.	Semi-Annual Review	EOY Review			EPA, CI

QUALITY ASSURANCE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
IV. AIR	Semi-Annual Review	EOY Review	1.00	.20	
A. Ambient: Continuing implementation of 40 CFR Part 58 Ambient Air Monitoring Quality Assurance Regulations.					AQB
B. Source: Continuing implementation of QA requirements for 40 CFR Parts 52 and 60, regarding stack testing and continuous emission monitoring for SIP and NSPS sources.					AQB, EPA
C. Submit QA plan for special purpose monitoring not part of monitoring program described in annual network review and covered by current SLAMS QA plan.					AQB
D. Provide assistance upon request.					EPA, RTP
V. ALL MEDIA	Semi-Annual Review	EOY Review			
A. Review State Quality Assurance (QA) documentation annually.					EPA, QAO
B. Support State's QA activities and provide assistance as necessary.					EPA, QAO
C. Submit annual QA Report.					MDA, DHES
D. Participate in systems audit as requested.					MDA, DHES
E. Successfully analyze performance evaluation samples as directed.					MDA, DHES
F. Implement the QA Program.					MDA, DHES
G. Redraft of unapproved plans are due 30 days after comments were given.					MDA, DHES

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
I. Emergency Response					
A. Immediate removal action in response to releases or substantial threats of releases of hazardous substances.			.10	.20	
1. Upon request by the State provide Federal on-scene coordinator (OSC) to monitor responsible party action for all severe releases requiring immediate removal.	Quarterly Review	Quarterly Review			EPA
2. Upon request by the State provide funding (if available) and OSC for immediate removal of releases when responsible party fails to provide proper response.	Quarterly Review	Quarterly Review			EPA
3. Carry out all State responsibilities under the State Environmental Emergency Response Plan and provide State OSC to monitor responsible party action for releases where Federal OSC not required.	Quarterly Review	Quarterly Review			State
B. Response to oil spills entering or threatening surface waters.			.20	.20	
1. Provide funding (if available) and direct cleanup of all spills when responsible party fails to properly respond.	Quarterly Review	Quarterly Review			EPA, State
2. Provide OSC for all major and selected medium spills to monitor response by responsible party.	Quarterly Review	Quarterly Review			EPA, State

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
3. Provide OSC for selected medium and all minor (when necessary) spills and carry out responsibilities under State Contingency Plans.	Quarterly Review	Quarterly Review			State
C. Contingency Planning.			.10	.10	
1. Update Region VIII Oil and Hazardous Substances Pollution Contingency Plan.	6/85				EPA
2. Update State Environmental Emergency Response Plan.	Semi-Annual Review	Review EOY			State
D. Training of State and Local Emergency Response Personnel.			.03		
1. Ensure adequate safety training provided to State personnel responding to hazardous material emergencies.	Within 90 days of hire, refresher training annually				WQB

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
II. Indian Air Program Technical Assistance					
Assist five tribes with the air monitoring, meeting monthly between State and EPA to review activities and progress.	6 meetings	12 meetings	1.0	.10	EPA, AOB
III. Indian Pesticides Program					
Assist Northern Cheyenne Tribe to implement enforcement program.				.10	EPA
IV. Flathead Basin Commission					
Serve as EPA representative on Flathead Basin Committee.	4 meetings per year			.05	EPA
V. Federal Agency EIS Review				.90	EPA
A. Review Federal agencies (BLM, FS, BPA, USGS, OSM) submissions.	Complete Review on Schedule	EOY Review			EPA
B. Interact with various Federal agencies to gain environmentally acceptable projects.	Semi-Annual Review	EOY Review			EPA
1. Pre-EIS consultation/EIS review of Forest Service Management Plans.					
2. Pre-EIS consultation/EIS review of BLM grazing plans, energy area land use plans, and other land use plans.					

CATEGORICAL MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES		RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	EPA	
	Date of Completion				
3. Pre-EIS consultation/EIS review of highway plans, airport plans, etc.					
4. Pre-EIS consultation/EIS review of water development projects.					
VI. Public Participation			1.20	.96	
A. Maintain mailing list of persons and organizations who have expressed an interest in or may be affected by any environmental issue or program.	Review Semi-Annual	Review EOY			DHES, DOA EPA
B. Provide copies of draft and final SEA to each state, public and college library.	5/85 7/85				EPA
C. Provide draft and final Agreement to interested public.	5/85 7/85				EPA
D. Provide summary of comments to public who responded to requests for comments.	7/85				DHES
E. Collect news articles about pertinent programs to determine public opinion.	Weekly to OEA	Weekly to OEA			DHES, DOA EPA

Cabin Creek International Joint Commission

Flathead Lake, Glacier National Park, the wild and scenic Flathead rivers and a great expanse of mountains, forests and highly productive agricultural valleys are located in the Flathead Basin area in Montana. The Flathead Basin is also the site of accelerating timber harvest, oil and gas exploration and possibly coal mine development on the Canadian side of the North Fork Flathead River.

The North Fork drains southward out of Canada, forms the western boundary of Glacier Park, and finally after meeting the Middle and South forks, empties into Flathead Lake. These rivers are all classed under the Wild and Scenic Rivers Act and are important fisheries and recreational resources.

A Canadian firm, Sage Creek Coal, proposed to construct and operate a very large open pit coal mine five miles north of the International Boundary on one of the North Fork's major tributaries. Sage Creek Coal filed its Stage II application on this project in 1982. Stage II is an "approval in principle" to undertake the proposal. The British Columbia government agreed to allow EPA and the State of Montana to review the Stage II documents.

Over 100 pages of comments were sent to the British Columbia government under Governor Schwinden's signature. EPA Region VIII's concerns were incorporated into the review prepared by the U.S. Department of Interior. EPA and the State were, and remain, concerned with water quality, visibility, wildlife endangerment, and reclamation issues.

The British Columbia government approved the Stage II application in the Spring of 1984. Sage Creek Coal has five years from this approval date to gain Stage III approval, receipt of the individual operating permits. If these permits are not received within that time frame, the entire process essentially starts over. Present economic conditions are such that Sage Creek Coal has not actively pursued these permits.

In February 1985, the International Joint Commission (IJC) agreed to accept a reference from the United States and Canadian governments. The 18 month effort would study water quality issues associated with construction and operation of the Cabin Creek Mine. The initial activity is the selection of Board and Committee members.

The State of Montana nd EPA will be actively involved in the 18 month evaluation. EPA is awarding $95,000 to the State of Montana to help defray costs for its IJC participation.

MONTANA FY 86 PROGRAM BUDGET ESTIMATES

Program	Federal Funds $	State Funds $	Total Grant $	Federal Manyears	State Manyears
Air Pollution Control (Section 105)	550,000	358,460	908,460		
Indian Technical Assistance	55,000		55,000		
Water Pollution Control (Section 106)	406,619	84,283	490,902		
Enforcement					
Water Quality Planning & Standards					
Monitoring					
Nonpoint Source Implementation					
Emergency Response					
Program Management					
Permits					
(Non CMAG 205(g))					
Operation & Maintenance					
(Included in 205(g))					
Groundwater	60,000***		60,000		
Monitoring	16,700***		16,700		
Flathead Basin IJC	90,000***		90,000		
Water Quality Management Planning (Section 205(j))	119,160	105,486	224,646		
Water Quality Planning & Standards	46,644	11,878	58,522		
Monitoring	54,686	13,926	68,612		
Nonpoint Source Implementation	11,259	2,867	14,126		
Program Management	43,427	11,059	54,486		
Construction Grants (Section 205(g))	476,640		291,264		
Advance of Allowance (Small communities Step 3 for planning and design)	40,000		40,000		
Operation & Maintenance					

***Special groundwater, reallocated monitoring, and IJC funding passed through 106 grant.

MONTANA FY 86 PROGRAM BUDGET ESTIMATES

Program	Federal Funds $	State Funds $	Total Grant $	Federal Manyears	State Manyears
Drinking Water Public Water System Supervision (Section 1443(a)) Reprogramed & carryover funds	322,200	108,248	430,448		
RCRA (Section 3011)					
Hazardous Waste Management Base	264,100	102,628	366,728		
FIFRA (Section 23(a)(2))					
Pesticide Applicator Certification and Training Incentive funds	19,200	19,200	38,400		
Pesticide Enforcement (Section 23(a)(1))	126,000				
CERCLA - Superfund					
Milltown (7/83 to 12/85)	820,956	32,797	853,753		
Silver Bow (10/83 to 10/86)	2,120,522	0	2,120,522		
RCRA 3012	26,000	0	26,000		